

27 August 2026

Secretary
Department of Planning, Housing and Infrastructure
Locked Bag 5022
Parramatta NSW 2124

Dear Secretary,

Re: SSD-92743706 - Mamre Road Data Centre Campus 706-752 Mamre Road, Kemps Creek – Exhibition of Amendments

1. Introduction

This submission has been lodged on behalf of the Trustees of the Catholic Church of the Diocese of Parramatta in relation to the following social infrastructure located immediately to the north of the site of the proposed Mamre Road Data Centre Campus (“the SSD”):

- **Emmaus Catholic College** – is a secondary school registered by the New South Wales Education Standards Authority (NESA) as a member of the Catholic system of schools in the Diocese of Parramatta. It provides secondary education to 700 male and female students from Years 7 to 12 and employs 92 full-time staff.
- **Trinity Catholic Primary School** – is a primary school registered by the New South Wales Education Standards Authority (NESA) as a member of the Catholic system of schools in the Diocese of Parramatta. It provides primary education to 250 male and female students from Years K to 6 and employs 46 full time staff.
- **Emmaus Retirement Village** - is operated by Catholic Healthcare and comprises 23 one-, two- and three-bedroom independent living units and associated support facilities and a residential aged care facility of 64 beds providing dementia and general care to seniors.

These uses support highly vulnerable populations (children, elderly and frail-aged residents) and constitute essential social infrastructure. They are co-located in a campus setting at 62-109 Bakers Lane, Kemps Creek comprising Lot 2 in DP556036 (“the Trustee land”) (see **Figure 1**) on the following page.

Together with the Mamre Anglican School, a Years K to 12 school with approximately 620 students, these facilities form a cluster of important social infrastructure being impacted individually and cumulatively by State significant developments in the locality. The three schools collectively support over 1,570 students, employ approximately 450 staff and provide accommodation for approximately 130 aged care residents.

The Diocese of Parramatta strongly objected to the first submission of the proposed location of a data centre of this size in close proximity to our schools and aged care facilities in Kemps Creek, which serve and care for children, older people and other vulnerable members of the community.

In principle, the Diocese has accepted one of the amendments made to the original submission, with conditions. However, our primary concern remains that the scale and size of this data centre is not suitable for this site and in such close proximity to school facilities. If a data centre on this site were to proceed, there must be clear assurances provided that all necessary safeguards and mitigation measures will be put in place to protect the health, safety and wellbeing of those in our care, and that these measures will be subject to appropriate ongoing monitoring and oversight.



Figure 1 – Facilities of the Trustees of the Catholic Church of the Diocese of Parramatta

2. Comments on the Amended Scheme

2.1 Roadworks

The amended development proposal incorporates the Northern Access Works (NAW), which mirror the Stage 1 roadworks approved for the Summit at Kemps Creek Estate and include

partial delivery of the southern half of the future Southern Link Road (SLR) corridor, configured to provide four traffic lanes with a signalised intersection to the site's internal road network.¹

The works are described as follows:

The proposal incorporates the Northern Access Works (NAW), a suite of road upgrades to the north of the site that are consistent with the Stage 1 roadworks approved to support the adjoining Summit at Kemps Creek Estate (SSD-30628110). While data centres generate low traffic volumes and the NAW are not strictly required to offset the proposal's own impact, the works are provided to support the wider MRP, consistent with consultation with the authorities. The NAW are incorporated under the concurrence pathway in clauses 2.34–2.35 of the State Environmental Planning Policy (Industry and Employment) 2021, with the site providing appropriate setbacks and dedications for the future freight corridor and the Southern Link Road. The NAW comprise:

- *Partial delivery of the Southern Link Road (SLR) as a dual carriageway (two lanes each direction) between Mamre Road and a new roundabout to the east of the site, replacing Bakers Lane.*
- *Retention of the existing Bakers Lane along the frontage of Mamre Anglican School and Emmaus Catholic College as a parallel local road, with the new eastern roundabout providing connectivity to Aldington Road / the SLR and a left-in connection to the west for local access from Mamre Road.*
- *Modification of the existing Mamre Road / Bakers Lane intersection, including dual exit lanes from Mamre Road accommodated by widening into the site frontage.*
- *A signalised intersection between the SLR and Road 01 (the north–south road through the site).*

Appendix D18 - *Infrastructure Delivery Strategy Report* says that these works will be delivered as part of Stage 1B and constructed in Years 2 to 5 (page 7).

This amendment is supported by the Diocese.

If the Minister is of a mind to approve the development, it is requested that a condition similar to condition A17 of the Summit @ Kemps Creek (SSD-30628110) consent which states:

CONSTRUCTION MANAGEMENT COMMITTEE

A17. For the duration of earthworks, Northern Access Road works and construction for each stage of development under the Concept Proposal, and until all components of the development are operational, the Applicant must establish a Construction Management Committee to oversee all construction works on the site and the Northern Access Road Works. The Committee must:

- (a) *be established in accordance with the Department's Community Consultative Committee Guidelines: State Significant Projects, 2023;*
- (b) *have an independent chair and include representatives from:*
 - (i) *the Mamre Anglican School, Trinity Catholic Primary, Emmaus Catholic College and Retirement Village;*
 - (ii) *residences on Bakers Lane and Aldington Road in the vicinity of the site;*
 - (iii) *the lead construction contractor(s) for the site works and the Northern Access Road Works;*
 - (iv) *the Applicant; and*
 - (v) *the Environmental Representative;*

¹ Page 50 of the Response to Submissions Report. See also pages 204-205.

- (c) *invite other relevant stakeholders to attend as required, including the Department, Council, Government agencies, NSW Police, etc;*
- (d) *detail the structure and agreed procedures for operating the Committee;*
- (e) *detail the procedures for consulting with all stakeholders, including nearby receivers that may not be represented on the Committee;*
- (f) *meet monthly, as a minimum, unless otherwise agreed by all Committee representatives;*
- (g) *report on the upcoming construction schedule, highlighting any works that may impact on receivers;*
- (h) *allow representatives from the Schools and residential receivers to provide feedback on actual construction impacts, and the actions required to minimise or rectify identified impacts;*
- (i) *establish procedures for ensuring earthworks and construction activities are restricted during the Higher School Certificate trial and final examination periods as required by condition C12, and any other sensitive time periods agreed by the Committee as sensitive to dust, noise and vibration disturbance;*
- (j) *report on air quality, noise and vibration monitoring data for the preceding month, highlighting any exceedance of criteria and the measures that were implemented to return to compliance;*
- (k) *detail the mitigation measures to be implemented through the trigger action response plans for air quality, noise and vibration;*
- (l) *develop additional contingency measures that would be implemented if adverse amenity impacts are occurring, including timeframes for implementation and a mechanism for reporting back to the Committee on the performance of these measures;*
- (m) *report on traffic management, including any non-compliance with designated routes, and the compliance actions that would be implemented for any vehicles that deviate from approved routes and turning restrictions; and*
- (n) *establish a complaints procedure for recording, responding to and managing complaints.*

A18. The Applicant must:

- (a) *not commence earthworks, Northern Access Road Works and construction until the representatives, structure and operating procedures of the Committee have been approved by the Planning Secretary;*
- (b) *operate the Construction Management Committee for the duration of earthworks, Northern Access Road Works and construction of all development under the Concept Proposal and until all components of the development are operational, unless otherwise agreed by the Planning Secretary; and*
- (c) *provide a report to the Planning Secretary within one week of each Committee meeting, including meeting minutes, actions and timeframes.*

Any consent should also include other conditions similar to the following conditions of Summit @ Kemps Creek (SSD-30628110) consent including:

- C11 concerning construction access;
- C12, C13, D41, D42, D44 regarding noise management;
- C18 regarding evidence of consultation;
- D30 regarding access;
- D31 regarding preparation of an Operational Traffic Management Plan;
- D60 regarding air quality monitoring during construction;
- D62 regarding construction monitoring.

2.2 Water Sources and Stormwater Management

It is noted that 840 air-cooled chillers (ACCs) are proposed for the development to reduce water demand.

Non-potable water is to be supplied from two sources:

- Stormwater harvested within precinct-wide wetlands / ponds, to be delivered and operated by Sydney Water as part of a regional stormwater management scheme;
- Recycled water from the planned Upper South Creek Advanced Recycled Water Centre.

Appendix D13 - *Water and Stormwater Management Plan* submitted with the Response to Submissions describes amendments to the water management arrangements for the proposal. Stormwater is to be managed through on-site attenuation measures for Stages 1a and 1b and connection to regional stormwater infrastructure planned for the Mamre Road Precinct for Stage 2 which is staged between 2 and years in the future (after 5 years if it follows Stage 1b). The proposal envisages that the Sydney Water trunk drainage channel will be completed at this stage. Stage 2 will also require completion of the remainder of the civil works across the site, including Road 1 north of the roundabout (excluding the future Southern Link Road which will be delivered by others) and Road 2 east of the roundabout.

Part of the site will drain to the proposed natural drainage channel along part of the northern boundary and then via culvert under the Southern Link Road.

Sydney Water's *Mamre Road Precinct Integrated Stormwater Scheme Plan* (December 2023, updated May 2025) identifies regional stormwater detention and drainage infrastructure that would affect land currently occupied by the school and aged care facility.

The amended proposal acknowledges that:

Due to the complexity of the delivery of wetland / storage pond 23 on land that is currently occupied by the Emmaus Catholic College and Trinity Catholic Primary School, discussions are ongoing with Sydney Water to amend the SSP to allow the entirety of the Mamre Road Data Centre Campus to drain towards Mamre Road and ultimately be managed by Wetland / Bio-Retention Basin 04 (located on the Yiribana Logistics Estate West site) and Storage Pond 3 (located on The Yards site). The ultimate stormwater management strategy that will service the Mamre Road Data Centre Campus has been developed on the assumption that the SSP will be amended to drain the entirety of the site towards Mamre Road.

The proposal now makes provision for stormwater management independent of the Sydney Water's integrated stormwater scheme located on school land for all stages of the development. This strategy is supported. Furthermore this strategy removes the need to rezone and acquire part of the schools land for the regional stormwater scheme at this stage.

2.3 Suitability of the site

Appendix D34 *Environmental Health Risk (EHRA) & Health Impact Assessment (HIA)* identify that the schools and aged care facilities on the school land have a high sensitivity to particulate matter, NO₂ and construction dust. and older people and people with cardiovascular or

respiratory conditions may be more susceptible to particulate matter and NO₂². There is likely to be minor to moderate potential effects including respiratory irritation, asthma exacerbation and cardiovascular stress in susceptible receptors, particularly where emissions coincide with high-dust periods. While the inherent risks are found to be low because of the expected low frequency of use of the diesel generators, the development nevertheless includes 842 x 2.0 MW generators and 15,842 kL of fuel to be stored on site for power outages and voltage disturbances caused by maintenance activities throughout the network, including temporary network switching operations to enable that maintenance; how much of the network base load will be supplied by rooftop solar panels based on the sunshine that day; local storms and lightning strike events at any point on the NEM; unexpected failure of electrical equipment within the network; and available generation and transmission supply through the interstate interconnectors³.

Children and elderly residents are particularly sensitive to emergency delays, service disruption and long-term land-use uncertainty. The proposal exposes the school and aged care communities occupying school land to cumulative and systemic risk.

DPHI is requested to consider whether this is an appropriate location for a data centre of this size.

We thank you for the opportunity to comment on this proposed development.

Yours sincerely,

BBC Consulting Planners



Dan Brindle
Director

² Table 11

³ Appendix D5, section 4.5.4.